



Regional Airline Association
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Docket Management System
U.S. Department of Transportation
docket number FAA-2002-13464
Room Plaza 401, 400 Seventh Street, SW.
Washington, DC 20590-0001.

**SUBJECT: Proposed Rule: Retrofit of Improved Seats in Air Carrier Transport
Category airplanes**

The Regional Airline Association (RAA) submits the following comments on behalf of our membership (Attachment A).

RAA requests that the comment period be extended for 90 days. We need additional time in order to adequately respond to the docket

We have found the Regulatory Evaluation(s) to be confusing. While we can understand your difficulty in having to append the initial Regulatory Evaluation several times to coincide with the publication date of the proposal, the reference in the April 2002 document back to the November 30, 2000 document, then back to April 20, 2000 Benefit Analysis document (DOT/FAA/AR-00/13) makes it more difficult to readily understand your rationale for proceeding with this proposal.

The mathematical models developed by Cherry & Associates do not account for the differences in fleet types. Consequently it is difficult to ascertain whether such models are appropriate for the smaller (regional) airplane types such as a Embraer EMB-120, Saab 340 or deHavilland DHC-8 airplanes. Developing decisions based on 5 Options, then further modifying the options to fit the proposal adds to the complexity in adequately understanding this proposal.

Your decision to only recognize “fully compliant” 16g seats without any analysis on the benefit of a partially compliant 16g seat also adds to the difficulty of adequately responding to the docket. Many seats in the regional fleet are partially 16g compliant. We need additional time to poll our members on the status of their seats and to ascertain what additional costs will be required to bring partially compliant seats into a fully compliant 16g status.



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Finally the events of 9/11/2001 and subsequent economic down-turn in our industry have significantly altered industry fleet sizes. This was not reflected in the latest (April 2002) document. Since your analysis is projecting what the fleet will look like 20 years into the future, we believe it is significant that your future fleet projection be based upon current fleet sizes. RAA will provide current data for the regional fleet.

Granting the industry additional time to respond will add greatly to understanding the issues and forecasts that serve to support the proposal.

Your consideration of our request is greatly appreciated.

Sincerely,

David Lotterer
Vice President - Technical Services

Attachment A

Company	City, State
Aeromar *	Mexico City, DF
Air Canada Jazz*	Enfield, Nova Scotia, Canada
AirNet Systems	Columbus, OH
Air Serv	Redlands, CA
Air Wisconsin	Appleton, WI
Allegheny	Middletown, PA
American Eagle	Dallas, TX
Atlantic Coast Airlines	Dulles, VA
Atlantic Southeast (ASA)	Atlanta, GA
Big Sky Airlines	Billings, MT
Boston-Maine Airways	Portsmouth, NH
Cape Air	Hyannis, MA
Chautauqua Airlines	Indianapolis, IN
Chicago Express	Chicago, IL
Colgan Air	Manassas, VA
Comair	Cincinnati, OH
CommutAir	Plattsburgh, NY
Continental Express	Houston, TX
Corporate Air	Billings, MT
Corporate Airlines	Smyrna, TN
Empire Airlines	Coeur d'Alene, ID



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ERA Aviation	Anchorage, AS
Executive Airlines	Farmingdale, NY
Express Airlines I	Memphis, TN
Federal Express	Memphis, TN
Grand Canyon	Grand Canyon, AZ
Great Lakes Aviation	Bloomington, MN
Great Plains Airlines	Columbia, MO
Gulfstream Int'l	Miami Springs, FL
Horizon Air	Seattle, WA
IBC Airways	Miami, FL
Island (Aloha) Air	Honolulu, HI
Mesaba	Minneapolis, MN
Midway Airlines	RDU Int'l Airport, NC
New England Airlines	Westerly, RI
North-South Airways	Atlanta, GA
Pace Airlines	Winston-Salem, NC
Piedmont Airlines	Salisbury, MD
PSA Airlines	Vandalia, OH
Scenic Airlines	N. Las Vegas, NV
Seaborne Airlines	US Virgin Islands
Shuttle America	Windsor Locks, CT
Skyway Airlines	Oak Creek WI
Skywest	St. George, UT
Sunworld Int'l Airlines	Ft. Mitchell, KY
Trans States	St. Louis, MO
Virginia Airways	Chesapeake, VA
Walker's Int'l	Ft. Lauderdale, FL

* foreign based air carrier